

PHILLIP A. TALBERT
United States Attorney
ANTONIO J. PATACA
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICARDO RIVAS ARREDONDO,

Defendant.

CASE NO. 1:22-CR-00297-JLT-BAM

STIPULATION TO VACATE STATUS
CONFERENCE AND SET CHANGE OF PLEA
HEARING; ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on 10/23/2024.
2. By this stipulation, defendant now moves to vacate the status conference as to Ricardo Rivas Arredondo only, and set this matter for a change of plea on 10/28/2024 and to exclude time between 10/23/2024, and 10/28/2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes thousands of pages of investigative reports, video, audio recordings, cell phone extractions, and other voluminous materials. Supplemental discovery has been either produced directly to counsel or made available for inspection and copying.

b) Counsel for defendant desires additional time to consult with his client, prepare for the change of plea hearing, and gather evidence in mitigation for the sentencing hearing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of 10/23/2024 to 10/28/2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Date: October 4, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Antonio J. Pataca
ANTONIO J. PATACA
Assistant United States Attorney

Date: October 4, 2024

/s/ Mark King
MARK KING
Counsel for Defendant
RICARDO RIVAS ARREDONDO

ORDER

IT IS SO ORDERED.

Dated: **October 5, 2024**


UNITED STATES DISTRICT JUDGE